

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATE FILED: _____
	:	
LEROY TOWNSEND	:	VIOLATIONS:
	:	
	:	18 U.S.C. § 2113(a) (bank robbery
	:	- 4 counts)
	:	18 U.S.C. § 2113(a) (attempted bank
	:	robbery - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about February 22, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

LEROY TOWNSEND

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of Conestoga Bank, 1632 Walnut Street, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$1,730, belonging to, and in the care, custody, control, management, and possession of, Conestoga Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 10, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

LEROY TOWNSEND

knowingly and unlawfully, by force and violence, and by intimidation, attempted to take from employees of Conestoga Bank, 1632 Walnut Street, Philadelphia, Pennsylvania, lawful currency of the United States belonging to, and in the care, custody, control, management, and possession of, Conestoga Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 26, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

LEROY TOWNSEND

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the Firsttrust Bank, 1515 Market Street, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$1,517, belonging to, and in the care, custody, control, management, and possession of, the Firsttrust Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 15, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

LEROY TOWNSEND

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of TD Banknorth, 1601 Market Street, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$4,010, belonging to, and in the care, custody, control, management, and possession of, the TD Banknorth, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 16, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

LEROY TOWNSEND

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of HSBC Bank, 1515 Market Street, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$6,199, belonging to, and in the care, custody, control, management, and possession of, the HSBC Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney